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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

VALERIE MCDONALD,

Plaintiff,

vs.

TRANS UNION LLC,

Defendant

Case No.: 2:23-cv-00416-JAD-BNW

STIPULATED DISCOVERY PLAN AND PROPOSED
SCHEDULING ORDER

SUBMITTED IN COMPLIANCE WITH LR 26-1(B)

Plaintiff Valerie McDonald and Defendant Trans Union LLC hereby submit this stipulated
Discovery Plan and scheduling order pursuant to Fed R. Civ. P 26(f). The parties jointly request that the Court
approve this plan and implement the plan as a scheduling order.

I. FED. R. CIV. 26(a) INITIAL DISCLOSURES

The parties stipulate to exchange Initial Disclosure pursuant to Fed. R. Civ. P 26(a) no later than June 30,
2023.

II. ESTIMATE OF TIME REQUESTED FOR DISCOVERY

A. DISCOVERY CUT OFF DATE

Discovery will take 180 days from June 14, 2023. Accordingly, all discovery must be completed
no later than **December 12, 2023**. The parties may conduct discovery within the scope of Fed. R. Civ. P. 26(b).
Subject to the foregoing, discovery need not be limited or focused on particular issues or conducted in phases.

B. AMENDING THE PLEADINGS AND ADDING PARTIES

Unless stated herein or ordered by the Court, the date for filing motions to amend the pleadings or
to add parties shall not be later than 120 days prior to the discovery cut-off date and therefore no later than **October**
12, 2023

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C. FED R. CIV. P. 26(a)(2) DISCLOSURES (EXPERTS)

Disclosures identifying experts pursuant to Fed. R. Civ. P. 26(a)(2) shall be made 90 days prior to the discovery cut-off date, and therefore not later than **September 12, 2023**. Disclosures of rebuttal experts shall be made 45 days after the initial disclosure of experts and therefore no later than **October 27, 2023**.

D. DISPOSITIVE MOTIONS

The parties shall file dispositive motions 30 days after the discovery cut off time and therefore no later than **January 11, 2024**.

E. PRETRIAL ORDER

If no dispositive motions are filed, and unless otherwise ordered by this Court, the joint Pretrial Order shall be filed 30 days after the date set for filing dispositive motions, and therefore not later than **February 10, 2024**. In the event that dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until 30 days after the Court enters a ruling on the dispositive motions, or otherwise by further order of the Court. The disclosures required by Fed. R. Civ. P. 26(a)(3), and any objections thereto, shall be included in the Joint Pretrial Order.

F. ALTERNATIVE DISPUTE RESOLUTION

Pursuant to LR 26-1(b)(7) the parties certify that they have discussed the possibility of using alternative dispute-resolution processes including mediation or arbitration. The parties have agreed to not use those processes at this time but remain open to using them after further progress in discovery.

G. ALTERNATIVE FORMS OF CASE DISPOSITION

The parties certify that they considered consenting to trial by a magistrate judge and use of the Short Trial Program, but the parties have not agreed to these alternative forms of case disposition.

H. ELECTRONIC EVIDENCE

The parties intend to meet and confer regarding electronic evidence should any disputes arise.

III. EXTENSIONS OR MODIFICATIONS OF THE DISCOVERY PLAN AND SCHEDULING ORDER PURSUANT TO 26-4

A motion or stipulation to extend any date set by the discovery plan, scheduling order, or other order must, in addition to satisfying the requirements of LR IA 6-1, be supported by a showing of good cause

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for the extension. A motion or stipulation to extend a deadline set forth in a discovery plan must be received by the court no later than 21 days before the expiration of the subject deadline. A request made within 21 days of the subject deadline must be supported by a showing of good cause. A request made after the expiration of the subject deadline will not be granted unless the movant also demonstrates that the failure to act was the result of excusable neglect. A motion or stipulation to extend a discovery deadline or to reopen discovery must include:

- (a) A statement specifying the discovery completed
- (b) A specific description of the discovery that remains to be completed;
- (c) The reasons why the deadline was not satisfied or the remaining discovery was not completed within the time limits set by the discovery plan; and
- (d) A proposed schedule for completing all remaining discovery

Dated this 14 day of June, 2023

By: /s/ Kurt R. Bonds

Kurt Bonds, NV Bar # 6228

By: Valerie McDonald

9004 In Vogue Ct

Las Vegas, NV 89149

valeriecmcdonald@gmail.com

Plaintiff, In Pro Per

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

June 16, 2023

DATED: _____

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